

1 **ROBERT MANN**, CSB 48293  
2 **DONALD W. COOK**, CSB 116666  
3 ATTORNEYS AT LAW  
3435 Wilshire Blvd., Suite 2900  
4 Los Angeles, CA 90010  
(213) 252-9444; (213) 252-0091 facsimile  
5 manncook@earthlink.net  
Attorneys for Plaintiff

6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10

11  
12 **JULIO ALVARADO**, an individual,  
13 Plaintiff,

14 vs.

15  
16 **WILLIAM J. BRATTON**; **LEE BACA**;  
17 **WILLIAM STONICH**, Assistant Sheriff;  
18 **LARRY W. WALDIE**; **DOYLE R.**  
19 **CAMPBELL**, Assistant Sheriff; **PAUL K.**  
20 **TANAKA**, Assistant Sheriff; **CHARLES**  
21 **JACKSON**, Division Chief; **MARC L.**  
22 **KLUGMAN**, Division Chief individually  
and in their official capacities; **CITY OF**  
**LOS ANGELES**; **CITY OF LOS**  
**ANGELES POLICE DEPARTMENT**;  
**COUNTY OF LOS ANGELES**; **LOS**  
**ANGELES COUNTY SHERIFF'S**  
**DEPARTMENT**

23 Defendants.  
24

Case No. CV06-7812 PA (RCx)  
(Assigned to the Hon. Percy  
Anderson)

**STIPULATION FOR  
PROTECTIVE ORDER  
REGARDING DISCLOSURE  
OF CONFIDENTIAL  
INFORMATION**

25 Whereas Plaintiff Julio Alvarado has propounded several requests for production  
26 of documents upon Defendants City of Los Angeles and the Los Angeles Police  
27 Department (collectively "City Defendants") pertaining to official and confidential  
28

1 information, contained in documents maintained by the “City Defendants”, and whereas  
2 the parties having met and conferred, the parties have stipulated to the following terms  
3 and conditions:

4 **A. ITEMS COVERED BY THIS PROTECTIVE ORDER**

5 1. The protective order applies only to the following:

6 a. The Los Angeles Police Department's Internal Affairs Investigation  
7 which relates to Plaintiff Julio Alvarado's arrest on November 5, 2005.  
8

9 2. Should any party wish to stamp any of the above records as “CONFIDENTIAL”  
10 that party may not stamp the records in such a way as to cover any written portion of the  
11 records. The documents must remain completely legible.

12 **B. USE OF RECORDS**

13 1. Absent further order of the Court, the items covered by this protective order for  
14 this case only, including any appeals, and not for any other purpose whatsoever.

15 2. Items covered by this protective order, including any related copies, summaries,  
16 extracts, notes, photographs, memos, audiotapes and transcripts, shall not be disclosed,  
17 except to the following persons:

18 a. The attorneys of record, including legal assistants, paralegals,  
19 investigators and clerical employees working under counsel’s supervision,  
20 as well as outside copying, graphic, computer services, and court reporters  
21 performing services in connection with this action;

22 b. Experts, consultants, investigators and their employees, retained and/or  
23 consulted by the attorneys of record to assist in the preparation of this  
24 action;  
25

26 c. The parties, including their officers, agents and employees who are  
27 directly assisting counsel with the conduct or resolution of this action;  
28

1 d. Witnesses while being examined by counsel at a deposition or trial.  
2 However, if the item is attached as an exhibit to a deposition transcript, the  
3 copy attached as an exhibit shall be redacted to omit names, birth dates,  
4 social security numbers, and addresses.

5 3. Before any disclosure of the items covered by this protective order, they will  
6 inform any person identified in Paragraph 2 above, of the terms of the protective order.  
7

8 4. If any party wishes to disclose items covered by this protective order to any  
9 person other than those listed in Paragraph 2, above, that party shall give written notice  
10 to the non-disclosing party so that the non-disclosing party can make a motion to prevent  
11 the disclosure. The party wishing to disclose the information will not to do so unless and  
12 until agreement with the other party is reached, or the other party's motion is ruled on by  
13 the court. If however, the other party does not file its motion within two weeks of the  
14 notice, the party wishing to disclose the information may deem the issue to have been  
15 abandoned.

16 5. Upon final determination of this action, whether by judgment, settlement or  
17 otherwise, including all appeals, and upon the producing party's request, Plaintiff shall  
18 return those items, along with all copies, to the producing party. Any messenger or  
19 postage fees shall be paid by the requesting party. In the alternative, the producing party  
20 may request the items be destroyed.  
21

22 **C. OTHER**

23 1. The execution of this protective order shall not preclude any party from moving  
24 the court for other or further protective orders during this action.

25 2. This protective order is subject to amendment and modification by further  
26 stipulation among counsel and/or by order of the Court.

27 ///

1 **IT IS SO STIPULATED:**

2 DATED: June 18, 2009

3  
4 **ROCKARD J. DELGADILLO**, City Attorney  
5 **MICHAEL L. CLAESSENS**, Senior Assistant City Attorney  
6 **CORY M. BRENT**, Assistant City Attorney

7 By 

8 **SUREKHA A. PESSIS**, Deputy City Attorney

9 *Attorneys for Defendants* **CITY OF LOS ANGELES, LOS ANGELES POLICE**  
10 **DEPARTMENT, WILLIAM J. BRATTON, DAVID GRIMES, ERIK SCHICK**  
11 **and MICHAEL LAMBARTH**

12 DATED: June 18, 2009

13 **ROBERT MANN**  
14 **DONALD W. COOK**  
15 Attorneys for Plaintiff

16 By 

17 Donald W. Cook

18  
19 DATED: June 23, 2009

20 **LAWRENCE BEACH ALLEN & CHOI, P.C.**

21  
22  
23 By 

24 **Scott E. Caron**

25 *Attorneys for Defendants* **COUNTY OF LOS ANGELES,**  
26 **LOS ANGELES COUNTY SHERIFF'S DEPARTMENT,**  
27 **SHERIFF WILLIAM STONICH, LARRY W. WALDIE,**  
28 **DOYLE R. CAMPBELL, PAUL K. TANAKA,**  
**CHARLES JACKSON, MARC L. KLUGMAN**